Lewis
Baach
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PLLC

May 19, 2017

VIA ECF

Hon. Frederick Block, U.S.D.J.
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Certain Underwriters at Lloyd's London, et al. v. National Railroad Passenger Corporation, et al.*, ECF Case 14-CV-04717-FB-RLM – **Consent Motion to Extend Time For Motions In Limine Now Due on May 30, 2017 to June 1, 2017**

Dear Judge Block:

Pursuant to Your Honor's Individual Motion Practices, Section 1.E, Plaintiffs London Market Insurers ("LMI") request a brief extension of time for filing all motions in limine (MILs), other than *Daubert* motions for certain experts now set for June 7. All other motions are now due on May 30, 2017. We request a two-day extension to June 1st. Amtrak is not willing to join the motion, but has authorized us to state that it consents to the extension. All other Insurers are on notice and none oppose. The reasons for the request are as follows:

In order to provide time to prepare the MILs and oppositions, all parties agreed to serve MILs on Friday (today), May 19, with oppositions due on the filing date, May 30, and no replies.

Amtrak has advised that it intends to serve and file seventeen (17) motions in limine. We intend to staff and work every day from now to the 30th, including this weekend and the three-day Memorial Day holiday weekend, in order to respond to the seventeen motions. (The Insurers expect to serve and file seven such motions.)

Amtrak's lead counsel, Rhonda Orin, has advised that she wishes to travel to attend a memorial service for a friend this afternoon, and asks to postpone the date for service of MILs from today until this Sunday. We responded that we would agree if the Court extends the current May 30 filing date by the same period, so that there will be no reduction in time to prepare oppositions to all of Amtrak's motions.

So that we may accommodate Ms. Orin, we seek to move the court-ordered filing date for MILs from May 30 to June 1. If the Court will do so, we will consent to Amtrak's request to move the service date to May 21.

We respectfully request prompt consideration of this request.

Respectfully submitted,

/s/ Joseph L. Ruby
Joseph L. Ruby

cc: All Counsel of Record